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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

HASHEEM BOUDJERADA; DAMON  
COCHRAN-SALINAS; ERIN GRADY;  
TYLER HENDRY; and KIRTIS  
RANESBOTTOM,

Case No. 6:20-cv-1265-MK

DECLARATION OF TYLER HENDRY

Plaintiffs,

v.

CITY OF EUGENE; SARAH MEDARY;  
WILLIAM SOLESBEE; SAMUEL STOTTS;  
BO RANKIN; TRAVIS PALKI; MICHAEL  
CASEY; ANTHONY VIOTTO; and RYAN  
UNDERWOOD,

Defendants.

1. I am one of the plaintiffs in this case. I make the statements in this declaration based upon my personal knowledge. I am competent to testify to the matters stated herein.
2. I identify as a person of color, and in my opinion I appear to others as a person of color.
3. On the afternoon of May 31, 2020, I went to join the George Floyd protest at the federal courthouse. After speeches there, I and other protesters moved to downtown.

4. I saw no property damage, physical violence, or threats of violence from any protesters while I was downtown.

5. At some point, I learned there was going to be a downtown curfew in effect starting at 9:00.

6. My friends and I and other protesters started walking away from the downtown area and we left the downtown curfew zone and gathered at Whole Foods. This was a block outside the curfew area, between High Street and Mill Street, and between Broadway and 8th Ave.

7. I decided to join the group there, to continue protesting the murder of George Floyd and police violence. I was careful to stay outside of the downtown zone, so I wouldn't be violating the curfew. I wanted to be within my legal rights. My intention was to move out of the curfew zone and continue exercising my First Amendment rights.

8. About fifty people gathered at the northeast corner of the Whole Foods parking lot.

9. Officers told people in the parking lot that it was private property and that people had to move out of the parking lot, so everyone in the parking lot relocated to the sidewalk.

10. I remember advising people not to go in the parking lot. I stayed on what I believed was the public sidewalk, off of the parking area.

11. We were peaceful. We knelt in honor of George Floyd, and put our hands up saying "Don't Shoot." I saw no property damage, physical violence, or threats of violence from any protesters.

12. Just a minute or so before 11 pm, there was an announcement that the curfew would be expanded city-wide starting at 11 pm.

13. I began walking east with two of my friends.

14. I stopped protesting when I started walking away from Whole Foods.

15. I was walking on the sidewalk. I only saw a couple of people stay in the street.

People were walking mostly on the sidewalk, heading away from downtown, in small groups of two or three, with a good amount of distance between the small groups of people. The police told us to disperse, and that's what we were trying to do.

16. I was leaving a dangerous situation. There was quite a bit of commotion, and during the evening we had heard threats of violence against us, and at that point I felt like it was unsafe for us to be there, and we needed to leave.

17. About 11:15 or 11:20, I was walking south on Patterson, on the east sidewalk, between 12th and 13th Avenues. I heard some commotion about a block up ahead, south. I saw some people running from that direction, running towards us. Somebody ran into my friend, and knocked his glasses off, and almost knocked him out. I had to help him to stand up. He was disoriented and couldn't see without his glasses. I tried to find his glasses, because we were trying to get away from whatever commotion was up ahead in the road. At that point it became even more of a dangerous situation and I didn't know what was going on.

18. As I was looking for my friend's glasses, two or three police officers tackled and grabbed me, and forced me to the ground and sat on me. When they grabbed me I was standing with my hands up.

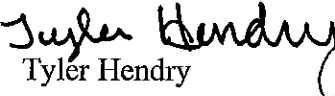
19. I didn't know the officers' names and couldn't see any name tags or badge numbers, but I later learned it was Sergeant Stotts and at last one other officer who grabbed me and forced me to the ground.

20. Officers handcuffed me and then they brought me to jail in a van. I was released

about noon the next day.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 27<sup>th</sup> day of September 2022, at Eugene, Oregon.

  
Tyler Hendry